



July 6, 2017

The Honorable Edmund G. Brown
 Governor, State of California
 State Capitol, Room 1173
 Sacramento, CA 95814

Re: Proposed Legislative Language to Implement Executive Order B-37-16, “Making Water Conservation a California Way of Life”

Dear Governor Brown,

The undersigned agencies appreciate this opportunity to submit comments on proposed legislative language, released June 20, 2017, to implement the Governor’s Executive Order B-37-16, “Making Water Conservation a California Way of Life,” consistent with the Administration framework released in April.

Water resource management in California faces unprecedented challenges from climate change and a growing population. The Chino Groundwater Basin region, located primarily in the western end of San Bernardino County, is at the cutting edge of these challenges, as our region lies in the interior hotter area of southern California and is one of the fastest growing areas of the State.

Collectively, our agencies have worked hard to develop a robust portfolio of local, drought-resilient water supplies that also help us reduce our dependence on imported water. Over the past 15 years, we have invested nearly five hundred million dollars in ratepayer and state/federal funding to develop over 100,000 acre-feet of new water supplies from recycled water, groundwater desalination, storm water capture and recharge, and improved water efficiency. We also did our part to achieve the mandated reductions in residential water use during the drought. The success of our collective work is underscored by the fact that the Chino Basin is one of the only regions in the State in which groundwater supplies increased between 2013 and 2016.

Since December 2016, we supported and offered suggestions for inclusion in the framework and the implementation proposal. Most of our recommendations have been incorporated into your June proposed language.

We particularly appreciate your recognition of the value of locally developed, drought resilient and hydrologically independent water supplies within water shortage contingency plans and the proposed standard-setting process that utilizes existing indoor and outdoor efficiency standards as the starting point.

We ask that you consider clarifying language to address the following points:

1. For water shortage contingency plans, expand the list of recognized hydrologically independent supplies to include treatment/reuse of contaminated groundwater and groundwater stored in designated accounts in sustainably managed groundwater basins. This is an important category of water supplies that have been developed specifically to provide drought resiliency.
2. For water efficiency target development, provide clear language for how variations in local conditions will be addressed. The framework indicates that adjustments will be made for unique circumstances. Such adjustments should be referenced in the proposed language.

Finally, we are encouraged that the Administration plans to move the proposed language through the Legislature's policy committee process, as stated in the Summary of Proposed Legislation.

Thank you for the opportunity to provide comments on this important legislation.

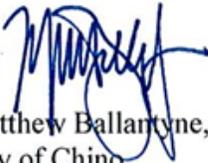
Sincerely,



Eunice Ulloa, Executive Director
Chino Basin Water Conservation District



Martin Thouvenell, Interim City Manager
City of Upland



Matthew Ballantyne, City Manager
City of Chino



Martin Zvirbulis, General Manager
Cucamonga Valley Water District



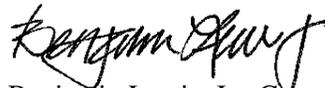
Rad Bartlam, City Manager
City of Chino Hills



Josh Swift, General Manager
Fontana Water Company



Chad Blais, Public Works Director
City of Norco



Benjamin Lewis, Jr., General Manager Foothill Dist.
Golden State Water Company



Linda Lowry, City Manager
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Todd Corbin, General Manager
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Mark Kinsey, General Manager
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Richard Hansen, General Manager
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John Rossi, General Manager
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